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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

AMAZON.COM, INC., a Delaware corporation,
and AMAZON TECHNOLOGIES, INC., a
Nevada corporation,

Plaintiffs,

v.

UMER WASIM, *et al.*,

Defendants.

Case No. 3:23-cv-05580-TLT

**MOTION FOR ENTRY OF
STIPULATED PERMANENT
INJUNCTION AND ORDER
RETAINING JURISDICTION**

MOTION FOR ENTRY OF STIPULATED PERMANENT INJUNCTION
AND ORDER RETAINING JURISDICTION

Pursuant to the previously-filed Notice of Settlement, Plaintiffs Amazon.com, Inc. and Amazon Technologies, Inc. (collectively, “Amazon”) and Defendants Umer Wasim and Teknoby Digital LLC (collectively, “the Defendants”), by and through themselves and their respective counsel of record, hereby stipulate and agree to entry of the below order. Upon entry of the order, Amazon will file a notice of voluntary dismissal within seven days.

DATED: February 14, 2025

DAVIS WRIGHT TREMAINE LLP
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Amazon Technologies, Inc.

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Teknoby Digital LLC

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Signature Attestation Pursuant to Local Rule 5-1(h)(3)

I, John Freed, attest that all other signatories listed, and on whose behalf this filing is submitted, concur in the filing’s content and have authorized the filing.

Dated: February 14, 2025

By: /s/John D. Freed

ORDER ENTERING PERMANENT INJUNCTION & RETAINING JURISDICTION

Pursuant to the parties' joint motion and stipulation for permanent injunction, IT IS HEREBY ORDERED that Defendants Umer Wasim and TeknobyL Digital LLC, and their directors, principals, officers, successors and assigns, and all others in active concert or participation with them, are enjoined and restrained from:

1. Using any trademarks registered by or otherwise associated with Amazon (the "Amazon Trademarks") or any simulation, reproduction, counterfeit, copy, or colorable imitation of them, in any manner in connection with any advertising, marketing, offer for sale, promotion, display, publication, website, email, or software, without Amazon's prior written consent (which it has sole discretion to provide or withhold for any reason);

2. Using any false designation of origin or false or misleading description or representation that can or is likely to lead the trade or public or individuals erroneously to believe that any website, email, advertisement, pop-up, or other marketing material has been produced, distributed, displayed, licensed, sponsored, approved or authorized by or for Amazon, when such is not true in fact;

3. Engaging in any other activity constituting an infringement or dilution of any of the Amazon Trademarks, or of Amazon's rights in, or right to use or to exploit, such trademarks or services marks;

4. Engaging in any other conduct involving the unauthorized use of Amazon Trademarks or other indicia of Amazon's brand to defraud or otherwise obtain payment from Amazon customers or other members of the public; and

5. Aiding, assisting, or abetting any other person or business entity in engaging in or performing any of the activities listed above.

Upon entry of voluntary dismissal, this Court will retain jurisdiction to enforce the terms of settlement between the parties.

DATED THIS ____ day of _____, 2025.

Hon. Trina L. Thompson
UNITED STATES DISTRICT JUDGE